

# Exhibit 5



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***Re: Baby Doe et al. v. Joshua Mast et al., Case No. 3:22-cv-49-NKM***


Ms. Eckstein:

Today you will receive a link to Defendants Joshua and Stephanie Mast's production of documents in connection with Plaintiff's Requests for Production. We are producing these documents in line with the instructions outlined in Plaintiffs' Requests for Production. Consistent with the Court's November 28, 2023 Opinion and Order, the Masts are not producing documents that were already produced to Plaintiffs in the Fluvanna County Circuit Court proceedings or which originate from that proceeding (i.e. discovery from your clients); they are also not producing documents from the Fluvanna County Juvenile and Domestic Relations Court proceeding and adoption proceeding because the law prohibits disclosing such documents without a court order.

The Masts' review of documents, including their review for attorney-client privilege, is ongoing. The Masts have encountered technical difficulties during the review and collection from some data from cell phones, but review efforts are ongoing and the Masts will produce those documents as soon as possible. The Masts will continue to produce documents on a rolling basis and will provide an updated privilege log in short order.

Additionally, the Masts have sent the United States a letter regarding documents that they cannot provide without the U.S. Government's approval under *Touhy*, consistent with the United States' position on *Touhy* in these proceedings. If and when Defendants receive approval to release additional documents, they will be promptly produce such documents.

Please let us know if you have any trouble accessing or viewing the production.

Cordially,  
  
Michael L. Francisco